

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	No. 3:20-cr-00165
)	Judge Campbell
)	
CALEB D. JORDAN)	

**UNOPPOSED MOTION TO EXTEND DEADLINE TO SUBMIT PLEA DOCUMENTS
AND TO SET CHANGE OF PLEA HEARING**

Caleb Jordan, through undersigned counsel, hereby moves this Honorable Court to extend the deadline to submit to chambers his Petition to Enter a Guilty Plea and his Plea Agreement with the government. He also requests that the plea hearing be set on January 31, 2023. In support of this Motion, Mr. Jordan would show the Court the following:

1. The deadline for consummating any plea agreement was January 16, 2023, and the deadline for submitting the Plea Agreement and Petition to Enter a Guilty Plea to chambers is January 17, 2023 (D/E 79).

2. The government sent the proposed plea agreement to undersigned counsel on January 12, 2023, and they met with Mr. Jordan to review the plea agreement and plea petition on January 13, 2023.

3. Due to Mr. Jordan's diagnosis of Autism, which impairs his comprehension skills, undersigned counsel need additional time to meet with him to ensure that Mr. Jordan fully understands the plea agreement and plea petition and to ascertain whether any revisions may be required. Undersigned counsel are scheduled to meet with Mr. Jordan again on January 18, 2023. Mr. Jordan requests that the deadline to submit the plea documents to chambers be extended to

January 25, 2023 to allow sufficient time for the parties to negotiate regarding any requested revisions to the plea agreement.

4. Defense counsel Kathleen Morris conferred with Assistant United States Attorney Carrie Daughtrey regarding the need for an extension of the deadline to submit the plea documents to the Court. AUSA Daughtrey has no objection to the requested extension.

5. Mr. Jordan requests that his plea hearing be set on January 31, 2023, the date on which the case would otherwise be scheduled for trial. AUSA Daughtrey has been consulted on this proposed date and has no objection to it.

6. Mr. Jordan fully expects that his case will be resolved by plea agreement and that the documents will be finalized by January 25, 2023. In the unlikely event that negotiations require additional time, he will file a motion to continue the trial. Given the circumstances described above, he requests that the deadline for filing any motion to continue be extended from its current deadline of January 17, 2023 to January 25, 2023.

Respectfully submitted,

s/Kathleen G. Morris

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Certificate of Service

I hereby certify that I filed this document through the Court's electronic filing system which generated a notification thereof to Assistant United States Attorney Carrie Daughtrey, 719 Church Street, Suite 3300, Nashville, TN 37203, this 17th day of January, 2023.

s/Kathleen G. Morris

Kathleen G. Morris